

SFUND RECORDS CTR
2207443

City of Santa Fe Springs

Headquarters Fire Station

11300 Greenstone Ave. • CA • 90670-4619 • (562) 944-9713 • Fax (562) 941-1817 • www.santafesprings.org

December 22, 1999

Geoff Soares
President
CENCO Refining Company
12345 Lakeland Road
Santa Fe Springs, CA 90670

Dear Mr. Soares:

The Fire Department is requesting information from the CENCO refinery regarding issues that require further clarification. These include the following:

1. The status of the slop oil tanks that are currently being investigated by the DTSC. Please provide background information on the oil and tanks, the status of the DTSC action, and the final removal plans for proper disposal of the oil.
2. There are three additional tanks which contain roughly 1,000 barrels of consolidated tank bottoms which may be regulated as hazardous waste. A new law which was passed in February of 1999 regulates tank bottoms as a hazardous waste. How is CENCO dealing with this issue? Please provide a legal determination on why you believe the tank bottoms may be stored longer than 90 days.
3. Please provide information on the status and disposal plan for the two tanks of "spent caustic", the slop oil tanks, any finished product and intermediate tank heels, streford solution, hydrotreating catalyst, and any other hazardous waste or materials stored at the refinery.
4. Provide information to the Fire Department regarding CENCO's wastewater discharge permit. What are the specifics of the current permit? What volume is CENCO allowed to discharge, and at what times may the facility discharge to the sewer system? Also, as agreed upon in our meeting, please notify this department in advance of any discharges of industrial waste water to the sewer system.
5. What was the situation under which CENCO moved materials (contaminated soils) from the old warehouse site to the Bloomfield site? If an analysis was performed on the soil piles for heavy metals, organic metals (such as organic lead), or chlorinated hydrocarbons, please provide the Fire Department with a copy of the analysis. If an analysis was not performed, the analysis will be included in the scope of item 6 below.

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6. As a result of the soil and drum issues at the Bloomfield site, a phase II assessment is required at that location to fully characterize the site. This should ensure there are no soil or groundwater issues that have developed at that location. This assessment will be combined within the current scope of work being performed on the Bloomfield site. Also, please provide the status of all other waste drums on CENCO property which were not part of the scope of this site characterization.
7. Was all the alkylate removed from the alkylation unit? Are there any flammable materials left in this unit? Is there any hydrofluoric acid bearing material remaining on site, including concentrations of less than 1% acid?
8. The hazardous materials inventory was last updated in 1996. An update of the inventory is required to reflect the current hazardous materials/hazardous wastes at the facility. Additionally, provide an update to the consolidated forms package to ensure that you are in compliance with the paperwork aspects associated with all the CUPA program elements (hazardous waste generator, tiered permitting, industrial waste, ...).
9. Provide documentation that your SPCC is up to date and accurately reflects the practices and inventory at the refinery.

The City of Santa Fe Springs is committed to working with CENCO on these issues to ensure that the refinery is in compliance with all regulatory requirements. Please provide a written response to these issues and any other outstanding issues at the refinery which may affect any actions the City is currently considering by January 15, 2000. If you have questions regarding these issues, please contact Richard Kallman, Environmental Protection Specialist, of the Santa Fe Springs Fire Department at 562-941-7483 ext. 126.

Sincerely,



Neal Welland
Fire Chief

cc: Fred Latham, City Manger
Bob Orpin, Director of Planning
Susan Bergeron-Vance, Director of Finance
Fred Nikitin, Fire Marshal
Dave Klunk, Director, Environmental Protection Division
Paul Ashworth, Director of Housing
Andy Lazzaretto, Planning and Development Consultant
Steve Skolnik, City Attorney, Santa Fe Springs
Colin Lennard, City Attorney, Santa Fe Springs
Patricia Chen, City Attorney, Santa Fe Springs
Brent Perry, Project Engineer, Los Angeles County Sanitation District
Florence Gharibian, Branch Chief, DTSC
Chorito Pinon, Hazardous Substances Scientist, DTSC